



Understanding Spill Prevention Control & Countermeasures Plans and Spill Prevention & Control Plans

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The Plans

- Spill Prevention Control & Countermeasures (SPCC) Plan
 - Required by 40 CFR part 112
 - Enforced by USEPA or their contractor
- Spill Prevention and Control (SPC) Plan
 - Required by LAC 33:IX Chapter 9
 - Enforced by LA DEQ





Purpose of SPCC/SPC plans

- Identify potential sources of spills and releases from your facility which may reasonably be expected to affect waters of the state or waters of the United States
- Describe and ensure implementation of practices and procedures which you will use to reduce or minimize spills being discharged from your facility; and
- Document steps to be taken in the event of a spill to lessen environmental damage.

Definition of spill plans

A written plan detailing the contingency planning, operating procedures and BMPs to prevent and control the discharge of pollutants resulting from spill events.

A spill event is the accidental or unauthorized leaking or releasing of an applicable substance from its intended container or conveyance that has the potential to be discharged or results in a discharge into waters of the state or United States.



Applicability

(Do I need to Worry about any of This?)



- Substance Stored
- Storage Capacity (Max volume NOT Operational volume)
- SPCC – “where there is a reasonable expectation of an oil discharge into or upon navigable waters of the US.”



Oil and related products SPCC & SPC



- Oil- any kind or form of oil, including but not limited to: fats, oils, or greases from animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and other oils and greases including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, and oil mixed with waste other than dredged spoil.
- 1320 gallons – single tank or in aggregate
- Count 55 gallon containers and up facility-wide (SPCC & SPC)
- *SPCC* - >42,000 gallons in buried storage



Other Substances

SPC ONLY



- All liquids (at standard temps and pressures) that have a Reportable Quantity (RQ) and are listed in the Notification Regulations and Procedures for Unauthorized Discharges (LAC 33:I.3931)
- 660 gallons – single tank
- 1320 gallons – multiple containers in a “*common storage area*”
- Count all containers (> 1 gal.)





**MUST DEVELOP A WRITTEN PLAN TO
PREVENT AND CONTROL THE DISCHARGE
OF POLLUTANTS FROM SPILL EVENTS INTO
WATERS OF THE UNITED STATES
AND/OR
WATERS OF THE STATE OF LOUISIANA**

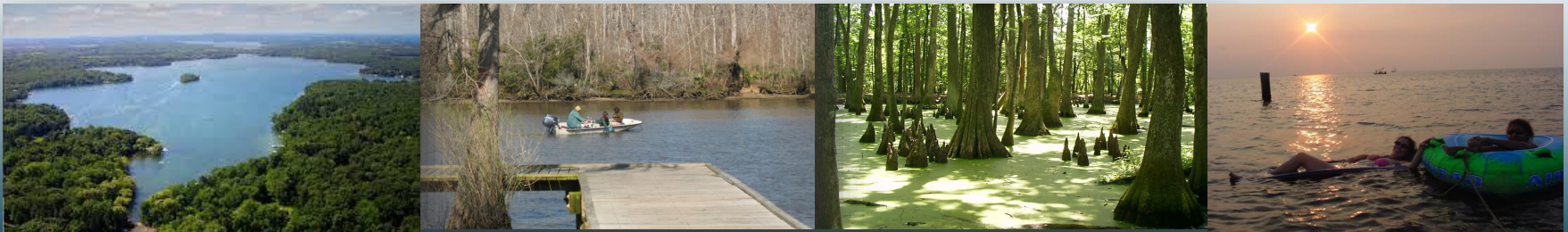


What are “waters of the US”

CWA definition:

All waters which are currently used, were used in the past or may be susceptible of use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tides.

This includes wetlands, territorial seas, impoundments, tributaries, ponds, lakes, oxbows, and similar waters.



What are waters of the state?

La R.S. definition:

All surface waters within the state of Louisiana and, on the coastline of Louisiana and the Gulf of Mexico, all surface waters extending 3 miles into the Gulf of Mexico. This includes all surface waters that are subject to the ebb and flow of the tide, lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, natural ponds, impoundments of waters within the state of Louisiana otherwise defined as Waters of the United States in 40 CFR 122.2, and tributaries of all such waters.





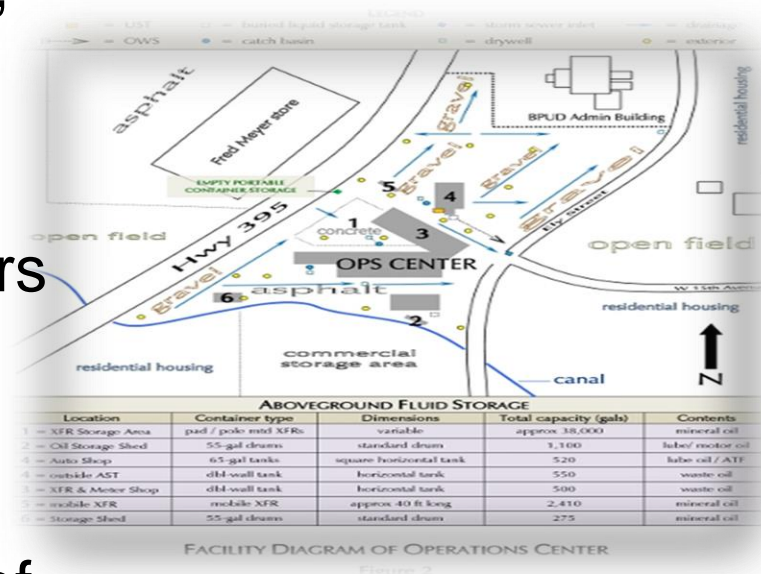
- **SHOULD-** is a guidance, a good idea, something that you might want to do...*it is not a requirement!*
- **SHALL/MUST-** is a requirement, it has to be done, failing to do so is a violation that you could be cited for.

*All above-ground tanks **should** be visually inspected by a competent person for condition and need for maintenance on a scheduled periodic basis. Such examination **should** include the foundation and supports of tanks that are above the surface of the ground. Visible leaks from a tank and its appurtenances **shall** be promptly corrected.-907.F.4*

SPCC/SPC general plan requirements



- General information on the facility, i.e. name, operator, location, mailing address, date and year of initial operation
- Description of the facility and location of nearest receiving waters
- Identity, amount, and location of substances stored
- Procedures for taking corrective action in the event of a spill
- A prediction of the direction, rate of flow and total quantity of applicable substances which could be spilled at the facility.



Containment Requirements

- Description of Containment or other Diversionary Structures, one of the following must (SPCC) should (SPC) be used at a minimum:
 - Dikes, berms, or retaining walls (impervious);
 - Curbing, drip pans;
 - Culverts, gutters or other systems;
 - Weirs, booms, or other barriers;
 - Spill diversion ponds;
 - Retention ponds;
 - Sorbent substances; and
 - Sumps and collection systems.



Alternative Containment Requirements (both SPCC & SPC)



- When the installation of containment or diversionary structures is not practical, the owner/operator **shall** clearly demonstrate such impracticality and provide a strong spill contingency plan
- Must have written commitment of manpower, equipment, and materials required to minimize damage resulting from a spill event.



Loading Areas Design Requirements (both SPC & SPCC)



- ⦿ All tank car and tank truck loading/unloading areas shall flow into a catchment basin designed to hold at least the maximum capacity of any single compartment.
- ⦿ A interlocked warning light or warning sign or a physical barrier system shall be provided to prevent inadvertent vehicular departure.
- ⦿ A procedure to visually examine all valves prior to filling or departure on all tank cars or trucks.



Process/Motive Equipment



- SPCC – oil filled equipment (hydraulic systems, lubricating systems, heat transfer systems, transformers, etc.), and vehicles used to transport oil within the confines of a facility need to be counted.
- SPC – Applicable substances stored in process or conveyance equipment is exempt as long as drainage from the process area is routed to an LPDES permitted outfall.



Off-site Transmission Pipelines



- ◎ **EXEMPT – both SPC & SPCC**





Other Plan Requirements

- Develop a plan before or start operating (SPCC) or within 180 days of facility start-up (SPC)
- Plans kept on site if attended for 8 hours (SPC) or 4 hours (SPCC) or at the nearest office if manned less than 8/4 hours
- Made available when requested for on-site review during normal working hours
- Amend whenever changes at the facility make the plan inadequate
- Review plan every 5 years and make amendments within 90 days

Other Plan Provisions

- Site Security: Req'd – SPCC, Optional – SPC
- Personnel Training: Req'd – SPCC (1/year), Optional – SPC
- Site Inspections: Req'd – SPCC, Optional – SPC *however, if your plan says you are going to do inspections – then you need to document that you are doing them.* Retain inspection logs for 3 years.



Other Plan Provisions

- NOTIFICATION Requirements

Contact Lists of local, state, and federal emergency reporting requirements and contact numbers.

- (Req'd –SPCC, Optional -SPC)



Notification Procedures for Unauthorized Discharges of Reportable Quantities



- The purpose of these regulations is getting the right information to the right people at the right time.
- Sewage does not have an RQ.
- **“Emergency Condition”** – any condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property.”
 - Discharger must call the DPS 24- hour Hotline within one hour and submit a Written Notification within seven calendar days.



Notification Procedures for Unauthorized Discharges of Reportable Quantities



- **Non-emergency conditions** – If the quantity of pollutant discharged exceeds the RQ but does not cause an emergency condition:

Discharger must promptly notify DEQ-SPOC within 24 hours after learning of the discharge, via website, email, or telephone; and, submit written report to DEQ within seven calendar days.

Discharge: *the placing, releasing, spilling, percolating, draining, pumping, leaking, mixing, leaching, migrating, seeping, emitting, disposing, by-passing, or other escaping of pollutants on or into the air, waters of the state, or the ground. LAC 33:I.3905.A*

YOU make the call based on the amount/location/duration of the discharge and if adequate contingency measures can be/have been taken.



PE Certification

- ⦿ A PE certification is **NOT** required for SPC plans

- ⦿ A PE certification **IS** required for SPCC plans; however a facility can self-certify if:
 - Total above-ground storage is $< 10,000$ gals, and
 - No spills in past 3 years $> 1,000$ gals or no two spills > 42 gals in within any 12 month period.
 - Tier I & Tier II facilities



SPC plan requirements for E&P sites (IX.708.c.1.b)



- ◉ Shall provide for a program of regular inspections and for annual flow line integrity
- ◉ Work-over and drilling barges and production facilities shall be equipped with pollution containment devices
- ◉ Equipment located over open water where the building of dikes is impossible or impracticable shall be installed on impervious decking with a system of curbs, gutters and/or sumps



SPC



- Oil – Yes 1320 gals
- RQ substances – Yes 660 gals or 1320 gals
- PE certification –No
- Off-site pipeline – No
- Process Equip– Maybe
- Subsurface - No
- 5 Year review – Yes
- Submit to Agency - No

LAC:33.IX.901

SPCC



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- RQ substances – No
- PE certification –Maybe
- Off-site pipeline – No
- Process Equip– Yes
- Subsurface - Maybe
- 5 Year review – Yes
- Submit to Agency - No

40 CFR 112

What Inspectors Look For

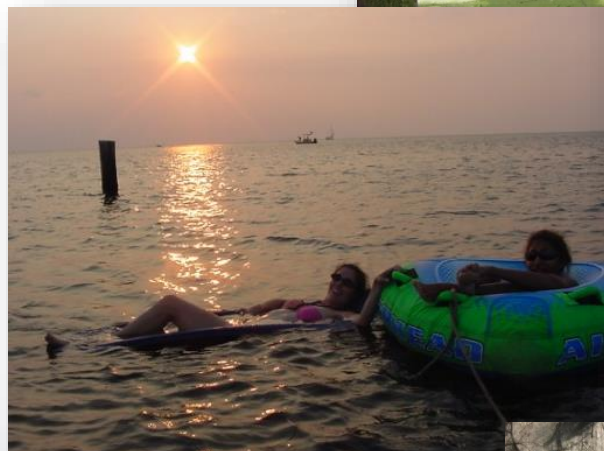


- ⦿ Has a SPC been developed and implemented?
- ⦿ Does the SPC match layout at the facility?
- ⦿ Are containment embankments maintained and contained area free of standing liquid?
- ⦿ Has the plan been reviewed every five years or amended with changes in storage capacity and/or substances being stored?
- ⦿ Are required inspections and/or training being conducted?
- ⦿ Are there adequate catchment basins at loading areas?
- ⦿ Other documentation being maintained?



FAQ'S

- ⦿ Exemptions
 - NONE-ZERO-ZILCH
- ⦿ One document or two?
 - Can be one document – *Remember that SPCC requirements are generally more stringent; however, SPC regulations cover more substances.*





SPCC Questions:

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